

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC
d/b/a HENRY HOLT AND COMPANY, *et*
al.,

Relief-Defendants.

Case No. 1:19-cv-1197-LO-TCB

**CONSENT MOTION TO CHANGE HEARING DATE AND FOR
EXTENSION OF TIME TO FILE BRIEF OPPOSING MOTION FOR SUMMARY
JUDGMENT AND WAIVER OF HEARING**

Defendant Edward Snowden, by his counsel, respectfully requests that the Court allow for a brief extension of time until November 20, 2019 for him to answer Plaintiff's complaint and to file a response to Plaintiff's pending motion for summary judgment, so as to allow Defendant adequate time to prepare his defense. Defendant additionally requests that Plaintiff's time to reply to Defendant's response to summary judgment be extended to December 6, 2019, and respectfully proposes that the Court delay its hearing on the motion for summary judgment until December 13, 2019, or such other date as may be set by the Court. These extensions are requested in light of the magnitude and scope of Plaintiff's motion for summary judgment, which was filed before Defendant even filed an answer, and which raises novel and significant legal theories and spans

over five hundred and fifty pages, including fifteen exhibits. Such an extension is necessary in order for the Defendant to appropriately respond to Plaintiff's arguments and to provide the Court with a brief that addresses each of the arguments advanced in Plaintiff's motion and that will assist the Court in addressing this significant matter. Counsel has conferred with counsel for Plaintiff, who has stated that Plaintiff does not oppose this extension, so long as it has sufficient time to reply to Defendant's submission, as would be the case under the schedule here proposed. The parties have agreed to waive a hearing on the issue of whether an extension should be granted.

A proposed order is submitted herewith.

Respectfully submitted,

EDWARD SNOWDEN

By counsel

Dated: November 6, 2019

Counsel for Defendant:

/s/ Victor M. Glasberg
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Certificate of Service

I, Victor M. Glasberg, hereby certify that on this 6th day of November, 2019, I electronically filed the foregoing Consent Motion to Change Hearing Date and for Extension of Time to File Brief Opposing Motion for Summary Judgment with the clerk of the court.

/s/ Victor M. Glasberg
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